

**UNITED STATES DISTRICT COURT FOR  
THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

PATRICK HALEY and  
RANDAL REEP, on behalf of  
themselves and all others similarly  
situated,

*Plaintiffs,*

v.

DELTA AIRLINES, INC.,

Defendant

Civil Action No. 1:21-cv-01076-SEG

**Plaintiff Haley’s Motion to Extend  
Time to Move to Compel Responses  
to Interrogatories**

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), Plaintiff Haley hereby moves this Court for an order extending his time to move to compel Defendant Delta Airlines, Inc. to provide further responses to his interrogatories nos. 1, 2, 6, 9, and 13 from today, January 10, 2023, to February 3, 2023.<sup>1</sup>

This Motion is supported by the accompanying Memorandum of Law, the Declaration of Colin M. Downes and exhibits thereto, the Proposed Order, all of the pleadings and documents on file with the Court in this action, and further

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<sup>1</sup> This Court’s standing order in civil cases provides that ‘[n]otwithstanding Local Rule 37.1,’ counsel must contact the Courtroom Deputy Clerk and seek leave of court prior to filing any motion to compel.” Counsel thus understands the motion to compel deadline fixed by local rule to govern the deadline by which counsel must so seek leave of court to file any such motion.

evidence and argument as may be submitted prior to the Court's decision on this motion.

Dated: January 10, 2023

Respectfully submitted,



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